

Lexington-Fayette Urban County Government DEPARTMENT OF LAW

Jim Gray Mayor Janet M. Graham Commissioner

April 26, 2011

Mr. Jeff Derouen Executive Director Public Service Commission 211 Sower Boulevard P.O. Box 615 Frankfort, Kentucky 40602-0615 RECEIVED

APR 27 2011

PUBLIC SERVICE COMMISSION

Re: Case No. 2011-00134

(Kentucky Utilities - Demand Side Management)

Dear Mr. Derouen:

Please find enclosed herewith for filing an original and 10 copies of Lexington-Fayette Urban County Government's Motion to Intervene in the referenced matter.

Yours truly,

David J. Barberie Attorney Senior

ENC

cc: Case Distribution List

X:\Cases\MAYOR\11-LP \COR\00298144.DOC



COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

APR 27 2011

PUBLIC SERVICE COMMISSION

In the Matter of:

THE JOINT APPLICATION OF)	
LOUISVILLE GAS AND ELECTRIC)	CASE NO.
COMPANY AND KENTUCKY UTILITIES)	2011-00134
COMPANY FOR REVIEW, MODIFICATION,)	
AND CONTINUATION OF EXISTING, AND)	
ADDTION OF NEW DEMAND-SIDE)	
MANAGEMENT AND ENERGY-EFFICIENCY)	
PROGRAMS)	

LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT'S MOTION FOR FULL INTERVENTION

COMES the Lexington-Fayette Urban County Government ("Lexington"), by counsel, and pursuant to 807 KAR 5:001 Section 3(8), moves that it be granted leave to intervene in this matter and that it be granted full intervention status. Approval of the application in this matter and the programs contained therein will have a significant impact on Lexington and the citizens of Fayette County. Lexington has a special interest in this matter, and it will not be adequately represented by the other parties. Lexington's participation in this matter is likely to assist the Commission in developing and identifying facts and issues and in fully considering this matter without unduly complicating or disrupting the proceedings.

Respectfully submitted,

BY:

David J. Barberie

dbarberi@lexingtonky.gov

Attorney Senior

Leslye M. Bowman

lbowman@lexingtonky.gov

Director of Litigation

Department of Law

200 East Main Street

Lexington, Kentucky 40507

(859) 258-3500

Attorneys for Lexington-Fayette Urban County

Government

FILING NOTICE AND CERTIFICATE

I hereby certify that an original and ten (10) copies of this Motion to Intervene were served and filed by first class U.S. Mail delivery, postage prepaid, to Jeff Derouen, Executive Director, Public Service Commission, P.O. Box 615, 211 Sower Boulevard, Frankfort, Kentucky 40602-0615; furthermore, it was served on the following by mailing a copy by first class U.S. Mail delivery, postage prepaid, and/or by electronic means, as further indicated below, all on this the 2b day of April 2011:

Mr. Lonnie Bellar Vice President, State Regulation & Rates LG&E and KU Services Company 220 West Main Street Louisville, Kentucky 40202

Hon. Kendrick R. Riggs Attorney at Law Stoll Keenon Ogden, PLLC 2000 PNC Plaza 500 West Jefferson Street Louisville, Kentucky 40202-2828

Hon. Allyson K. Sturgeon Senior Corporate Attorney E.ON U.S. LLC 220 West Main Street Louisville, Kentucky 40202

Hon. Dennis G. Howard, II Hon. Larry Cook Assistant Attorneys General Office of the Attorney General Utility & Rate Intervention Division 1024 Capital Center Drive, Suite 200 Frankfort, Kentucky 40601-8204

Iris G. Skidmore Bates & Skidmore 415 West Main Street, Suite 2 Frankfort, Kentucky 40601

ATTORNEY FOR LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT

X:\Cases\MAYOR\11-LP___\PLE\00298152.DOC